

1 **TIFFANY & BOSCO**  
2 P.A.

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8 Mark S. Bosco  
9 State Bar No. 010167  
10 Leonard J. McDonald  
11 State Bar No. 014228  
12 Attorneys for Secured Creditor

13 10-04619

14 **IN THE UNITED STATES BANKRUPTCY COURT**  
15 **FOR THE DISTRICT OF ARIZONA**

16 IN RE:

17 Fred Ramirez and Norma Ramirez

18 Debtors.

19 HomeAmerican Mortgage Corporation

20 Secured Creditor,  
21 vs.

22 Fred Ramirez and Norma Ramirez, Debtors;  
23 Edward J. Maney, Trustee.

24 Respondents.

25 No. 2:10-bk-02500-CGC

26 Chapter 13

OBJECTION TO CHAPTER 13 PLAN

27 HomeAmerican Mortgage Corporation, a secured creditor, by its attorneys, TIFFANY & BOSCO,  
28 P.A., hereby objects to the proposed Chapter 13 Plan filed by the Debtor for the following reasons:

29 1. The Chapter 13 Plan does not adequately provide for repayment of arrearages owed to  
30 HomeAmerican Mortgage Corporation, pursuant to the proof of claim in the amount of \$17,618.10.  
31 Secured creditor requests that the arrearages as set forth in its Proof of Claim be paid through the Plan. A

1 copy of Secured Creditor's Proof of Claim is attached hereto as Exhibit "A" and made a part hereof by this  
2 reference.

3 2. The Chapter 13 Plan filed with the Court does not provide to secured creditor repayment of  
4 its attorney fees incurred for bankruptcy and/or foreclosure proceedings. Secured creditor requests that the  
5 attorney fees as set forth in its Proof of Claim be paid through the Plan.

6 Secured Creditor will withdraw these objections when presented with a Stipulated Order  
7 Confirming Plan that provides for the arrearages, interest and fees as provided in the Proof of Claim and as  
8 stated above.

9 DATED this 23rd day of February, 2010.  
10

11 Respectfully submitted,  
12

13  
14 TIFFANY & BOSCO, P.A.  
15

16 COPY of the foregoing mailed  
17 February 23, 2010 to:  
18  
19 BY /s/ MSB # 010167  
20 Mark S. Bosco  
21 Leonard J. McDonald  
22 Attorneys for Secured Creditor  
23

24 Fred Ramirez and Norma Ramirez  
25 10109 W. Preston Lane  
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26 Joseph W. Charles  
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Trustee

By: Julie Bush

